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6 Attorney for John Burnett

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOHN BURNETT,

14 Defendant.
15

Case No. 2:21-cr-00319-APG-DJA-1

STIPULATION TO CONTINUE
SENTENCING HEARING
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 LaRonda R. Martin, Assistant Federal Public Defender, counsel for John Burnett, that the
21 Sentencing Hearing currently scheduled on April 20, 2022, be vacated and continued to a date
22 and time convenient to the Court, but no sooner than forty-five (45) days.

23 The Stipulation is entered into for the following reasons:

- 24 1. The defense needs additional time to gather evidentiary documents in support of
25 any legal objections to the presentence report and mitigation arguments for
26 sentencing.

2. Undersigned counsel will be out of district for training on May 10, 2022 through May 12, 2022. Counsel will also likely be out of district on June 12, 2022 through June 25, 2022 or July 17, 2022 through July 30, 2022 for the National Criminal Defense College (NCDC) training program. Counsel requests that the above dates be excluded from the new sentencing hearing date.
3. The defendant is not incarcerated and does not object to the continuance.
4. The parties agree to the continuance.
5. The additional time requested by this stipulation is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

This is the first stipulation to continue filed herein.

DATED this 11th day of April, 2022.

RENE L. VALLADARES
Federal Public Defender

/s/ LaRonda R. Martin
By _____

LARONDA R. MARTIN
Assistant Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Bianca R. Pucci
By _____

BIANCA R. PUCCI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JOHN BURNETT,
8

9 Defendant.

Case No. 2:21-cr-00319-APG-DJA-1

ORDER

10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
11 Wednesday, April 20, 2022 at 10:00 a.m., be vacated and continued to June 9, 2022 at
12 the hour of 9 : 00 a.m. in Courtroom 6C; or to a time and date convenient to the court.
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14 DATED this 12th day of April, 2022.

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16 UNITED STATES DISTRICT JUDGE
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